

**Exhibit D**



**U.S. Department of Justice**

Environment and Natural Resources Division

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***Environmental Defense Section  
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Washington, DC 20044***

***Telephone (202) 353-7466  
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July 5, 2024

**Via Email**

Ryan D. Walters  
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Office of the Texas Attorney General  
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Re: *United States v. Abbott*, et al., No. 1:23-cv-853 (W.D. Tex.);  
Identification of United States' anticipated experts solely for rebuttal

Dear Counsel:

Pursuant to Federal Rule of Civil Procedure 26(a)(2) and the March 5, 2024 Scheduling Order in this case (ECF 97), Plaintiff the United States of America hereby identifies the following new expert witness that the United States anticipates offering solely for rebuttal purposes:

(1) Michael D. Chapman, Shawnee, Kansas

Mr. Chapman is currently employed with the U.S. Army Corps of Engineers as Senior Technical Lead for the Kansas City District.

Mr. Chapman is expected to offer expert testimony in rebuttal to the testimony of some or all of the following: F. Douglas Shields, Ancil Taylor, T.J. Ciarametaro, Carlos Rubinstein, Herman Settlemeyer, Christina Magers, and Cassandra Hart.

The United States reserves the right to offer testimony from its previously disclosed case-in-chief expert witnesses rebutting the testimony of any expert witnesses offered by Texas. To the extent any reports are required pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), the United States will disclose them to Texas no later than July 12, 2024, pursuant to the scheduling order in this case. The United States reserves the right to supplement, amend, or modify its expert disclosures and any reports or opinions offered by its experts.

Sincerely,

ANDREW  
KNUDSEN

Digitally signed by  
ANDREW KNUDSEN  
Date: 2024.07.05 21:37:28  
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Andrew D. Knudsen  
Trial Attorney  
U.S. Department of Justice  
Environment & Natural Resources Division

Cc (by email): All other counsel of record